

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CENTRAL LABORERS PENSION FUND, et al.,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 11 C 4100
	)	
ERIC HELANDER MASONRY	)	JUDGE HARRY D. LEINENWEBER
CONSTRUCTION, LLC, an Illinois limited	)	
liability company,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, ERIC HELANDER MASONRY CONSTRUCTION, LLC, an Illinois limited liability company, in the total amount of \$2,720.78, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,419.75.

On July 8, 2011, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to his secretary, Julia Powers) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on July 29, 2011. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon \_\_\_\_\_

### **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 31st day of August 2011:

Mr. Douglas E. Lee, Registered Agent  
Eric Helander Masonry Construction, LLC  
215 E. 1st Street, Suite 100  
Dixon, IL 61021

/s/ Cecilia M. Scanlon \_\_\_\_\_

Cecilia M. Scanlon  
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